



A Tradition of Stewardship
A Commitment to Service

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Kerry John Whitney
Risk & Emergency Services Manager

September 26, 2018

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: **AMENDED** FCC Rule Waiver Request for Live Wireless Emergency Alert (WEA)
Test - PS Docket No. 15-91

Dear Secretary Dortch:

Napa County Office of Emergency Services hereby amends its letter dated September 14, 2018, by requesting approval of the Commission's rules on behalf of the Commercial Mobile Service (CMS) Providers to conduct a live-code WEA test of the Napa County Emergency Alert System using Everbridge/Nixle notification on October 9, 2018.

The live-code test is scheduled to occur at 0930 hours Pacific Standard Time (PST) on October 9, 2018, and if necessary, a back-up date of October 23, 2018 at 0930 PST. The test will be conducted by the Napa County Office of Emergency Services (OES) which is the primary alert and warning authority for IPAWS in Napa County. The live-code test will involve a Wireless Emergency Alert (WEA) only. This test would target the entire area of Napa County utilizing the CA 06-055 Napa County H1 FIPS code. The WEA message is less than 90 characters in length. The text of the test will read: **TEST - Napa County** www.napacounty.org/IPAWS **to provide feedback. No other action needed.** This test is not intended to be a substitute for other scheduled tests.

This will be the first live test of the WEA system for Napa County. Napa County was devastated by wildfire in October of 2017. We are currently in the peak of wildfire season and already have experienced devastating fires in our neighboring counties. The purpose of conducting the test at this time is to ensure that emergency management officials are able to test and validate its IPAWS origination capabilities and the participant's abilities to disseminate emergency messages to the public. Napa County believes that it is imperative to test the system now rather than wait until May 2019 when the FCC's WEA end-to-end testing rules become effective.

OES has prepared a comprehensive communications plan and exercise plan. Staff have been in direct contact with jurisdictions who have successfully conducted WEA and EAS tests, including Sonoma County. Napa County will draw upon the experiences of those jurisdictions and lessons learned to fully inform and prepare this test effort.

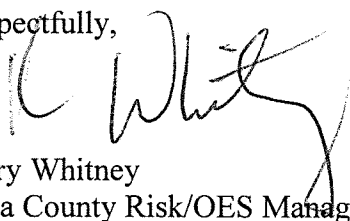
As a part of this test, all participants have been notified of the planned test, including our local CMS providers. A thorough and well planned public outreach campaign will precede the test by no less than one week. The public information campaign will include press releases, public service announcements, public messages, websites and social media campaign to target our constituents, as well as surrounding counties. The outreach effort also inform the public that a test will be conducted on the WEA and that no action is required. Additionally, messaging will include public information to ensure public understanding of the need and value for the scheduled WEA test. Napa County will also reach out to the public information officers of the affected local jurisdictions including local school districts and colleges to help with communication.

All emergency response agencies that operate within and adjacent to Napa County, including first responder organizations such as Law Enforcement, Fire/EMS agencies, and 911 Public Safety Answering Points (PSAPS), will be informed to ensure they are aware of the test and confirm to the public the WEA message is a test.

Subsequent to the test, OES will execute the evaluation element of the exercise plan. The evaluation will have three components, several hundred staff and volunteers strategically located within the test area to evaluate the WEA capabilities and responses provided by the public through the website survey.

We appreciate the opportunity to partner with the FCC and FEMA to test the IPAWS functionality within Napa County. Thank you for your consideration!

Respectfully,

A handwritten signature in black ink, appearing to read "K. Whitney", is written over the printed name and title.

Kerry Whitney
Napa County Risk/OES Manager